

MILMAN LABUDA LAW GROUP PLLC

3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

November 22, 2021

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Sanket J. Bulsara, U.S.M.J.
225 Cadman Plaza East
Courtroom 324N
Brooklyn, NY 11201-1804

Re: Macas v. Alex's Auto Body 1 Inc., et ano.
Case No.: 1:18-cv-7184 (RJD) (SJB)
MLLG File No.: 120-2019

Dear Judge Bulsara:

This office represents the Defendants in the above-referenced case. See Docket Entry 17. I write to respectfully request a brief adjournment of the *Cheeks* motion hearing scheduled to proceed on Wednesday, November 24, 2021 at 10:30 AM.

Pursuant to this Court's Individual Practices ¶ II(A): (i) the original date is set forth above and proposed new dates¹ are Wednesday, December 1, 2021 (any time except between 2:00 PM to 3:30 PM), Thursday, December 2, 2021 (any time after 2:00 PM), or Friday, December 3, 2021 (any time after 2:00 PM); (ii) the reason for the request is because your undersigned is scheduled to appear in person at the Supreme Court of the State of New York, Nassau County at 9:30 AM and because the individual Defendant (who is also the principal of the corporate Defendant) will be out of the country on this day; and (iii) Plaintiff consents to this request.

Accordingly, Defendants respectfully request that this Court adjourn the *Cheeks* motion hearing and that sufficient good cause exists in light of the conflicts raised in this letter. See Fed. R. Civ. P. 6(b)(1)(A).

Defendants thank this Court for its time, attention, and anticipated courtesies in this case.

¹ The parties provide these dates with the understanding that the parties are required to appear with their counsel for the virtual *Cheeks* motion hearing. If the parties are not required to appear with their counsel, the parties are available to conduct the *Cheeks* motion hearing later in the day on November 24, 2021, as early as 1:30 PM but no later than 3:00 PM.

Dated: Lake Success, New York
November 22, 2021

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 303-1395 (direct dial)
(516) 328-0082 (facsimile)
emanuel@mllaborlaw.com

Attorneys for Defendants

VIA ECF
Plaintiff